


EXHIBIT 1

INTERNET
FORM NLRB-501
(2-08)UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER**DO NOT WRITE IN THIS SPACE**Case
12-CA-163435Date Filed
11/5/2015**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT			
a. Name of Employer American Sales and Management Organization, LLC, d/b/a Eulen America		b. Tel. No. 305-445-7801	
		c. Cell No.	
		f. Fax No. 305-442-1578	
d. Address (Street, city, state, and ZIP code) 7200 Corporate Center Drive, Suite 206 Miami, FL 33126		e. Employer Representative Susan Potter Norton, Esq. Allen, Norton and Blue, P.A. 121 Majorca Ave., Suite 300 Coral Gables, FL 33134-4508	
		g. e-Mail snorton@anblaw.com	
		h. Number of workers employed over 300 at MIA	
i. Type of Establishment (factory, mine, wholesaler, etc.) Airline service contractor at MIA		j. Identify principal product or service Airport terminal and passenger services at MIA	
k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) Within the past six months, the above-named employer, through its agents and representatives, distributed and required employees working at Miami International Airport (MIA) to agree to, as a condition of continued employment, a contract titled "Mandatory Arbitration Agreement and Class Action Waiver" which waived employees' right to pursue all class or collective actions relating to disputes regarding the employment relationship, as protected under Section 7 of the Act. In or about October 2015 and November 2015, the above-named employer, through its agents and representatives, unlawfully coerced employees in the exercise of their Section 7 rights by interrogating them over union organizing activities and by giving the impression of employer surveillance of employee organizing activities.			
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Service Employees International Union, Local 32BJ			
4a. Address (Street and number, city, state, and ZIP code) 25 W. 18th St. New York, NY 10011		4b. Tel. No. 212-388-3642	
		4c. Cell No.	
		4d. Fax No. 212-388-2062	
		4e. e-Mail tgottheil@seiu32bj.org	
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Service Employees International Union, CLC			
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.		Tel. No. 212-388-3642	
By  (signature of representative or person making charge)		Office, if any, Cell No.	
Thomas Gottheil, Law Fellow (Print/type name and title or office, if any)		Fax No. 212-388-2062	
Address 25 W. 18th St., New York, NY 10011		e-Mail tgottheil@seiu32bj.org	
		11/5/2015 (date)	

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)**PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

EXHIBIT 2


INTERNET
FORM NLRB-501
(2-08)UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
Amended CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case
12-CA-163435Date Filed
1/7/2016

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer American Sales and Management Organization, LLC, d/b/a Eulen America	b. Tel. No. 305-445-7801
	c. Cell No.
	f. Fax No. 305-442-1578
d. Address (Street, city, state, and ZIP code) 7200 Corporate Center Drive, Suite 206 Miami, FL 33126	e. Employer Representative Susan Potter Norton, Esq. Allen, Norton and Blue, P.A. 121 Majorca Ave., Suite 300 Coral Gables, FL 33134-4508
	g. e-Mail snorton@anblaw.com
	h. Number of workers employed over 300 at MIA
i. Type of Establishment (factory, mine, wholesaler, etc.) Airline service contractor at MIA	j. Identify principal product or service Airport terminal and passenger services at MIA
k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) Within the past six months, the above-named employer, through its agents and representatives, distributed and required employees working at Miami International Airport (MIA) to agree to, as a condition of continued employment, a contract titled "Mandatory Arbitration Agreement and Class Action Waiver" which waived employees' right to pursue all class or collective actions relating to disputes regarding the employment relationship, as protected under Section 7 of the Act. In or about October 2015 and November 2015, the above-named employer, through its agents and representatives, unlawfully coerced employees in the exercise of their Section 7 rights by interrogating them over union organizing activities and by giving the impression of employer surveillance of employee organizing activities. In or about November 2015, the above-named employer, through its agents and representatives, unlawfully discharged an employee, Freddy Gonzalez, in retaliation for engaging in activities protected by Section 7.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Service Employees International Union, Local 32BJ	
4a. Address (Street and number, city, state, and ZIP code) 25 W. 18th St. New York, NY 10011	4b. Tel. No. 212-388-3642
	4c. Cell No.
	4d. Fax No. 212-388-2062
	4e. e-Mail tgottheil@seiu32bj.org
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Service Employees International Union, CLC	
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.	
By  (signature of representative or person making charge)	Thomas Gottheil, Law Fellow (Print/type name and title or office, if any)
Tel. No. 212-388-3642	
Office, if any, Cell No.	
Fax No. 212-388-2062	
e-Mail tgottheil@seiu32bj.org	
Address 25 W. 18th St., New York, NY 10011	1/7/2016 (date)

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

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EXHIBIT 3

INTERNET
FORM NLRB-501
(2-08)UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER*Second Amended***DO NOT WRITE IN THIS SPACE**Case
12-CA-163435Date Filed
2/11/2016**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer

American Sales and Management Organization, LLC, d/b/a Eulen America

b. Tel. No. 305-445-7801

c. Cell No.

f. Fax No. 305-442-1578

d. Address (Street, city, state, and ZIP code)

7200 Corporate Center Drive, Suite 206
Miami, FL 33126

e. Employer Representative

Susan Potter Norton, Esq.
Allen, Norton and Blue, P.A.
121 Majorca Ave., Suite 300
Coral Gables, FL 33134-4508

g. e-Mail

snorton@anblaw.com

h. Number of workers employed
over 300 at MIA

i. Type of Establishment (factory, mine, wholesaler, etc.)

Airline service contractor at MIA

j. Identify principal product or service

Airport terminal and passenger services at MIA

k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Within the past six months, the above-named employer, through its agents and representatives, distributed and required employees working at Miami International Airport (MIA) to agree to, as a condition of continued employment, a contract titled "Mandatory Arbitration Agreement and Class Action Waiver" which waived employees' right to pursue all class or collective actions relating to disputes regarding the employment relationship, as protected under Section 7 of the Act.

In or about November 2015, the above-named employer, through its agents and representatives, unlawfully discharged an employee, Freddy Gonzalez, in retaliation for engaging in activities protected by Section 7.

On a date within the last six months, the above-named employer, through its agents and representatives, coerced employees in the exercise of their Section 7 rights by telling them that they could not speak to Union representatives.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

Service Employees International Union, Local 32BJ

4a. Address (Street and number, city, state, and ZIP code)

25 W. 18th St.
New York, NY 10011

4b. Tel. No. 212-388-3642

4c. Cell No.

4d. Fax No. 212-388-2062

4e. e-Mail

tgottheil@seiu32bj.org

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

Service Employees International Union, CLC

6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

By



(signature of representative or person making charge)

Thomas Gottheil, Law Fellow

(Print/type name and title or office, if any)

Tel. No. 212-388-3642

Office, if any, Cell No.

Fax No. 212-388-2062

e-Mail

tgottheil@seiu32bj.org

Address 25 W. 18th St., New York, NY 10011

2/11/2016

(date)

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)**PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.

EXHIBIT 4

SUBPOENA**UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD**

Vilma Garcia
356 E. 63rd Street
To Hialeah, FL 33016

As requested by MARINELLY MALDONADO, on behalf of the General Counsel

whose address is 51 SW 1st Ave Ste 1320, Miami, FL 33130-1623
(Street) (City) (State) (ZIP)

YOU ARE HEREBY REQUIRED AND DIRECTED TO APPEAR BEFORE the Regional Director or his/her designee
of the National Labor Relations Board

at 51 SW 1st Avenue, Suite 1320

in the City of Miami, FL

on Tuesday, March 14, 2017 at 10:00 A.M. or any adjourned

or rescheduled date to testify in American Sales and Management Organization, LLC d/b/a Eulen America
Case 12-CA-163435
(Case Name and Number)

If you do not intend to comply with the subpoena, within 5 days (excluding intermediate Saturdays, Sundays, and holidays) after the date the subpoena is received, you must petition in writing to revoke the subpoena. Unless filed through the Board's E-Filing system, the petition to revoke must be received on or before the official closing time of the receiving office on the last day for filing. If filed through the Board's E-Filing system, it may be filed up to 11:59 pm in the local time zone of the receiving office on the last day for filing. Prior to a hearing, the petition to revoke should be filed with the Regional Director; during a hearing, it should be filed with the Hearing Officer or Administrative Law Judge conducting the hearing. See Board's Rules and Regulations, 29 C.F.R. Section 102.31(b) (unfair labor practice proceedings) and/or 29 C.F.R. Section 102.66(c) (representation proceedings) and 29 C.F.R. Section 102.111(a)(1) and 102.111(b)(3) (time computation). Failure to follow these rules may result in the loss of any ability to raise objections to the subpoena in court.

A-1-VLT61N

Under the seal of the National Labor Relations Board, and by direction of the Board, this Subpoena is

Issued at Miami, FL

Dated: March 1, 2017



Philip A. Miscimano
Acting Chairman, National Labor Relations Board

NOTICE TO WITNESS. Witness fees for attendance, subsistence, and mileage under this subpoena are payable by the party at whose request the witness is subpoenaed. A witness appearing at the request of the General Counsel of the National Labor Relations Board shall submit this subpoena with the voucher when claiming reimbursement.

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing representation and/or unfair labor practice proceedings and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is mandatory in that failure to supply the information may cause the NLRB to seek enforcement of the subpoena in federal court.

Case 12-CA-163435

A-1-VLT61N

RETURN OF SERVICE

I certify that, being a person over 18 years of age, I duly served a copy of this subpoena

(Check method used.)

- ☒ by person
☐ by certified mail
☐ by registered mail
☐ by telegraph
☐ by leaving copy at principal office or place of business at

on the named person on

03/01/17

(Month, day, and year)

Ricardo Morillas

(Name of person making service)

Field Examiner

(Official title, if any)

CERTIFICATION OF SERVICE

I certify that named person was in attendance as a witness at

on

(Month, day or days, and year)

(Name of person certifying)

(Official title)